

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA  
WESTERN DIVISION

No. 5:21-CR-221-1B0(4)

UNITED STATES OF AMERICA )

v. )

MICHAEL ANDREW GILSON )

INDICTMENT

The Grand Jury charges that:

Count One

On or about July 1, 2020, in the Eastern District of North Carolina, the defendant, MICHAEL ANDREW GILSON, did knowingly employ, use, persuade, induce, entice, and coerce Victim #1, a minor female, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct. The visual depiction was transported and transmitted using any means and facility of interstate and foreign commerce; all in violation of Title 18, United States Code, Sections 2251(a) and (e).

Count Two

On or about July 3, 2020, in the Eastern District of North Carolina, the defendant, MICHAEL ANDREW GILSON, did knowingly employ, use, persuade, induce, entice, and coerce Victim #2, a minor female, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct. The visual

depiction was transported and transmitted using any means and facility of interstate and foreign commerce; all in violation of Title 18, United States Code, Sections 2251(a) and (e).

### **Count Three**

On or about July 3, 2020, in the Eastern District of North Carolina, the defendant, MICHAEL ANDREW GILSON, did knowingly use any facility and means of interstate and foreign commerce to persuade, induce, entice, and coerce Victim #2, a minor female who had not attained the age of 18 years, to engage in any sexual activity for which any person can be charged under North Carolina state law, that is, sexual exploitation of a child (N.C.G.S. § 14-190.17), and under federal law, that is, production of child pornography (18 U.S.C. § 2251(a)); in violation of Title 18, United States Code, Section 2422(b).

### **Count Four**

On or about July 13, 2020, in the Eastern District of North Carolina, the defendant, MICHAEL ANDREW GILSON, did knowingly employ, use, persuade, induce, entice, and coerce Victim #3, a minor male, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct. The visual depiction was transported and transmitted using any means and facility of interstate and foreign commerce; all in violation of Title 18, United States Code, Sections 2251(a) and (e).

### Count Five

On or about July 16, 2020, in the Eastern District of North Carolina, the defendant, MICHAEL ANDREW GILSON, did knowingly employ, use, persuade, induce, entice, and coerce Victims #4 and #5, minor females, to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct. These visual depictions were transported and transmitted using any means and facility of interstate and foreign commerce; all in violation of Title 18, United States Code, Sections 2251(a) and (e).

### Count Six

On or about July 16, 2020, in the Eastern District of North Carolina, the defendant, MICHAEL ANDREW GILSON, did knowingly use any facility and means of interstate and foreign commerce to persuade, induce, entice, and coerce Victims #4 and #5, minor females who had not attained the age of 18 years, to engage in any sexual activity for which any person can be charged under North Carolina state law, that is, sexual exploitation of a child (N.C.G.S. § 14-190.17), and under federal law, that is, production of child pornography (18 U.S.C. § 2251(a)); in violation of Title 18, United States Code, Section 2422(b).

### Count Seven

On or about July 29, 2020, in the Eastern District of North Carolina, the defendant, MICHAEL ANDREW GILSON, did knowingly employ, use, persuade, induce, entice, and coerce Victim #6, a minor female, to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct. These visual

depictions were transported and transmitted using any means and facility of interstate and foreign commerce; all in violation of Title 18, United States Code, Sections 2251(a) and (e).

#### **Count Eight**

On or about July 29, 2020, in the Eastern District of North Carolina, the defendant, MICHAEL ANDREW GILSON, did knowingly use any facility and means of interstate and foreign commerce to persuade, induce, entice, and coerce Victims #6, a minor female who had not attained the age of 18 years, to engage in any sexual activity for which any person can be charged under North Carolina state law, that is, sexual exploitation of a child (N.C.G.S. § 14-190.17), and under federal law, that is, production of child pornography (18 U.S.C. § 2251(a)); in violation of Title 18, United States Code, Section 2422(b).

#### **Count Nine**

On or about August 8, 2020, in the Eastern District of North Carolina, MICHAEL ANDREW GILSON, the defendant herein, did knowingly possess one or more matters, that is, computer hard drives and computer media containing digital and computer images and videos, the production of which involved the use of one or more minors, including minors who had not attained 12 years of age, engaging in sexually explicit conduct, and which images visually depicted such conduct. The images and videos had been mailed, shipped and transported in interstate and foreign commerce and by use of means and facilities of interstate commerce, i.e., the Internet, and were produced using materials which had been mailed, shipped, or transported

in interstate and foreign commerce, by any means including by computer, all in violation of Title 18, United States Code, Section 2252A(a)(5)(B).

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### FORFEITURE NOTICE

Upon conviction of one or more of the offenses set forth in Counts One, Two, Four, Five, Seven, and Nine, MICHAEL ANDREW GILSON, the defendant herein, shall forfeit to the United States, pursuant to Title 18, United States Code, Sections 2253(a):

1. any visual depiction or book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of the offense(s);
2. any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the offense(s); and
3. any property, real or personal, used or intended to be used to commit or to promote the commission of such offense(s) or any property traceable to such property.

Upon conviction of one or more of the offenses set forth in Counts Three, Six, or Eight, MICHAEL ANDREW GILSON, the defendant herein, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 2428,

1. The defendant's interest in any property, real or personal, that was used or intended to be used to commit or to facilitate the commission of such violation; and
2. Any property, real or personal, constituting or derived from any proceeds that such person obtained, directly or indirectly, as a result of such violation.

The forfeitable property includes, but is not limited to a black Apple iPad, bearing serial number DMPJKXF8F18W.

If any of the above-described forfeitable property, as a result of any act or omission of the defendant

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

A TRUE BILL

REDACTED VERSION

Pursuant to the E-Government Act and the federal rules, the unredacted version of this document has been filed under seal.

FOREPERSON

DATE: 27 May 2024

G. NORMAN ACKER, III  
Acting United States Attorney

By:



JAKE D. PUGH

Assistant United States Attorney  
Criminal Division